

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

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In Re Bard IVC Filters § No. MD-15-02641-PHX-DGC
Products Liability Litigation §
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- - -
Thursday, June 15, 2017
- - -

** DO NOT DISCLOSE **

** SUBJECT TO FURTHER CONFIDENTIALITY REVIEW **

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Videotaped deposition of BRANDON KANG, M.D.,
held at Mahaffey, Pickens & Tucker, 1550 North
Brown Road, Suite 125, Lawrenceville, Georgia,
commencing at 10:09 a.m., on the above date,
before Susan D. Wasilewski, Registered
Professional Reporter, Certified Realtime
Reporter, Certified Realtime Captioner, Certified
Manager of Reporting Services, Florida
Professional Reporter, Certified Court Reporter
(NJ), and Realtime Systems Administrator

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BRANDON KANG

<p style="text-align: right;">Page 74</p> <p>1 shot of your Twitter account?</p> <p>2 A. Yes, it is.</p> <p>3 Q. And that's your picture there, isn't it?</p> <p>4 A. That is me.</p> <p>5 Q. And Exhibit 12 shows that you joined</p> <p>6 Twitter -- and I'm not a Twitter person, so if I use</p> <p>7 it wrong, let me know. You joined Twitter in March of</p> <p>8 2017; is that right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. You also have a Facebook account,</p> <p>11 don't you?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And I only brought with me portions of</p> <p>14 your Twitter account. It looks like that when you put</p> <p>15 something on Twitter, you most often also post it to</p> <p>16 Facebook; is that right?</p> <p>17 A. A lot of times I do, yes.</p> <p>18 Q. Do you also have a Instagram account?</p> <p>19 A. No.</p> <p>20 Q. Other than Twitter and Facebook, do you use</p> <p>21 any other forms of social media in your professional</p> <p>22 capacity?</p> <p>23 A. No.</p> <p>24 Q. If you would look at what I've marked as</p> <p>25 Exhibit 11, that is a screen shot of a GIF or a short</p>	<p style="text-align: right;">Page 75</p> <p>1 video that you posted to Twitter on April 7, 2017,</p> <p>2 isn't it?</p> <p>3 A. Yes.</p> <p>4 Q. And would you read for the jury what you</p> <p>5 Tweeted or posted on April 7, 2017, please?</p> <p>6 A. It says: "Happy Friday. Let's do this.</p> <p>7 Filter out. Filters can say lives, but should be</p> <p>8 removed as soon as the risk of PE is mitigated.</p> <p>9 IRad," and a little cowboy.</p> <p>10 Q. Okay. So when it says "filter out," it</p> <p>11 actually says #filterOUT?</p> <p>12 A. Right.</p> <p>13 Q. At the end of your post or Tweet it says</p> <p>14 #IRad?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Is that right?</p> <p>17 A. Yes.</p> <p>18 Q. And then it has an emoji?</p> <p>19 A. Yeah.</p> <p>20 Q. Is that what that's called? And the emoji is</p> <p>21 a smiley face with a cowboy hat on it; is that right?</p> <p>22 A. Yep. Yes.</p> <p>23 Q. And let's just, while we're looking at this,</p> <p>24 this #filterOUT, is that a phrase you created?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 76</p> <p>1 Q. Do you know who created that phrase?</p> <p>2 A. I do not.</p> <p>3 Q. Okay. Have you seen other interventional</p> <p>4 radiologists posting on social media #filterOUT?</p> <p>5 A. Yes.</p> <p>6 Q. What other interventional radiologists have</p> <p>7 you seen posting that?</p> <p>8 A. You mean name names?</p> <p>9 Q. Yes, sir.</p> <p>10 A. Dr. Yu from Colorado, I mean, Gunn from</p> <p>11 Alabama. I mean, they're -- it's -- I mean, you can</p> <p>12 do a search for #filterOUT and then there is a lot of</p> <p>13 doctors Tweeting filters.</p> <p>14 Q. When you -- why did you join Twitter in your</p> <p>15 professional capacity in March of 2017?</p> <p>16 A. That was shortly after our society meeting in</p> <p>17 DC, March of this year, the Society of Interventional</p> <p>18 Radiology. I became aware during that meeting that a</p> <p>19 lot of interventional radiologists were Tweeting</p> <p>20 their cases and showing people things, so I thought</p> <p>21 it was a good way to kind of join and get involved.</p> <p>22 Q. Your Twitter account is not limited to</p> <p>23 interventional radiologists, correct? I mean, I was</p> <p>24 able to find it.</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. So it's public?</p> <p>2 A. I mean, it's an -- it's an open account, yes.</p> <p>3 Q. It's publicly available?</p> <p>4 A. Yes.</p> <p>5 Q. Is that right? And your Facebook likewise is</p> <p>6 public, you don't have it limited to your Facebook</p> <p>7 friends, for example?</p> <p>8 A. Okay.</p> <p>9 Q. Is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Because I was able to see your Facebook.</p> <p>12 A. (Nodding head.)</p> <p>13 Q. So interventional radiologists are using</p> <p>14 social media to communicate with each other, but</p> <p>15 you're also using it to communicate publicly; is that</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Let's go back to the April 7 Tweet</p> <p>19 post. "Filters can save lives," we agree with that,</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And "but should be removed as soon as</p> <p>23 the risk for PE" -- what is PE?</p> <p>24 A. Pulmonary embolism.</p> <p>25 Q. That's a blood clot, right?</p>